

**From:** [James McFadden](#)  
**To:** [Keller, Kaitlin](#)  
**Cc:** [Jakob, Avivah](#); [Parrott, Patricia](#); [Steve Spaulding](#)  
**Subject:** RE: Propoxur Draft Voluntary Cancellation Request for Wellmark  
**Date:** Tuesday, August 13, 2013 3:32:24 PM  
**Attachments:** [image001.jpg](#)

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Kaitlin –

The potential for misuse exists for most pesticides that are registered with EPA – your logic would force many products (maybe most consumer products) to be canceled. That potential should not be the basis for this decision.

The issue really is that if you allow the large dog and cat sizes to continue, you can't ask for a voluntary cancellation, and so your proposed mechanism for discontinuation doesn't work. Yet you've agreed that the large collars DO pass the risk assessment. How do we get around this? Our attorneys would like to talk directly to OGC about the wording of the document, to understand EPA's sensitivity about specific issues. Could we have them call the author of the letter directly? In addition, we think ironing out these details will take at least another week, and so I'd like to ask that you allow us until August 23 to reply.

Thank you for your assistance,

Regards,

James McFadden, Ph.D.

Sr. Regulatory Project Manager

Central Garden & Pet



847-330-5369 (Office)

847-650-3336 (Cell)

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**From:** Keller, Kaitlin [mailto:[Keller.Kaitlin@epa.gov](mailto:Keller.Kaitlin@epa.gov)]  
**Sent:** Monday, August 12, 2013 8:29 AM  
**To:** James McFadden  
**Cc:** Jakob, Avivah; Parrott, Patricia  
**Subject:** RE: Propoxur Draft Voluntary Cancellation Request for Wellmark

Good morning Jim,

Regarding the large collars, we did agree during our last call that they passed the risk assessment, but said we would discuss the issue internally before making a decision. After considering the bigger picture a little more, we believe that the best way to ensure that the risk mitigation addresses our concerns is to insist that all of the collars be reformulated, so the letter treats all of the collars/sizes the same. We have concerns that there could be consumer misuse because the large collars could be adjusted to fit smaller animals. Please let me know if you have any additional questions about this.

Regards,

Kaitlin

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**From:** James McFadden [mailto:[jmcfadden@central.com](mailto:jmcfadden@central.com)]  
**Sent:** Saturday, August 10, 2013 11:39 AM  
**To:** Keller, Kaitlin  
**Cc:** Jakob, Avivah; Parrott, Patricia  
**Subject:** RE: Propoxur Draft Voluntary Cancellation Request for Wellmark

Kaitlin –

Thanks for sending the letter, we are actively reviewing it.

As a first question, though, it isn't clear how the large dog and cat are affected by this letter. If you recall our discussion by phone, it was agreed that they did pass EPA's risk assessment and shouldn't need to be canceled.

Some additional clarification would be useful.

Thanks,

James McFadden, Ph.D.

Sr. Regulatory Project Manager

Central Garden & Pet



847-330-5369 (Office)

847-650-3336 (Cell)

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**From:** Keller, Kaitlin [<mailto:Kaitlin.Kaitlin@epa.gov>]

**Sent:** Thursday, August 08, 2013 2:58 PM

**To:** James McFadden

**Cc:** Jakob, Avivah; Parrott, Patricia

**Subject:** Propoxur Draft Voluntary Cancellation Request for Wellmark

Hello Jim,

As discussed in our July 2<sup>nd</sup> conference call, attached please find a draft version of the voluntary cancellation request for Wellmark propoxur pet collars. We realize you may have some tweaks or minor changes, but we believe that, overall, the language adequately reflects the actions and time frames agreed upon in previous discussions, including our commitment to 90-day study protocol reviews. We request that you send a final draft version to us for review by the end of next week before finalizing it, and that in the final version you incorporate specific dates for each action from the date the letter will be signed. Please keep in mind that we are still committed to other deadlines for the propoxur petition this quarter, so the sooner we can agree on the language and receive the signed request, the better.

Regards,

Kaitlin

Kaitlin Keller

Chemical Review Manager, Risk Management and Implementation Branch III

Pesticide Re-evaluation Division

USEPA Office of Pesticide Programs

Phone: (703) 308-8172

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